

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:**

**GALLERIA 2425 OWNER, LLC,**

**DEBTOR.**

§  
§  
§  
§  
§

**CASE NO. 23-34815**

**CHAPTER 11**

**UNITED STATES TRUSTEE’S LIMITED OBJECTION AND RESERVATION OF  
RIGHTS TO DEBTOR’S APPLICATION TO EMPLOY ATTORNEYS [ECF 67]**

***Responds and Objects the Pleading Filed at [ECF 67]***

TO THE HONORABLE JEFFREY P. NORMAN, UNITED STATES BANKRUPTCY JUDGE:

KEVIN M. EPSTEIN, the United States Trustee for Region 7 (the “U.S. Trustee), files this *Limited Objection and Reservation of Rights to Debtor’s Application to Employ Attorneys [ECF 67]* (the “Limited Objection”) responding and objecting, pursuant to 11 U.S.C. § 327, to the *Debtor’s Application to Employ Attorneys [ECF 67]* (the “Application”), because the U.S. Trustee submitted comments and requested revisions to the proposed retention order to which the Debtor has not responded, and states as follows:

**I. Procedural and Factual Background**

1. On December 5, 2023, (the “Petition Date”), Galleria 2425 Owner, LLC (the “Debtor”) filed a voluntary petition for relief under Chapter 11 of the United States Code, 11 U.S.C. § 101 *et seq.* (the “Bankruptcy Code”) with the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “Court”). This Court has not appointed a Trustee or Examiner, nor has an official committed been established in this Chapter 11 proceeding. On January 10, 2024, the meeting of creditors was held and concluded.

2. This is a single asset real estate case, pursuant to 11 U.S.C. §101(51B). The Debtor owns a commercial high-rise office building located at 2425 West Loop South, Houston, Texas

77027.

3. On December 22, 2023, Debtor filed the Application seeking authority to retain and employ the Reese W. Baker and Baker & Associates (collectively, “Baker”) as its attorney in all matters arising in or related to this case, effective as of December 6, 2023.

4. On January 26, 2024, the U.S. Trustee submitted written comments to the Application and requested specific revisions to the proposed Order to conform the Debtor’s retention and employment of Baker, as counsel, to the requirements of 11 U.S.C. §§ 327 and 330. As of the date of this Limited Objection, Debtor has failed to respond to the U.S. Trustee’s written comments and requested revisions. Accordingly, the U.S. Trustee files this Limited Objection to reserve its right to seek additional time and information from the Debtor to support its Application.

## **II. Limited Objection**

5. To be clear, the U.S. Trustee does not object to the Debtor’s retention and employment of Baker.

6. With respect the terms of the proposed Order, however, the U.S. Trustee has numerous issues and, in connection with those terms, has requested revisions. To date, the Debtor has failed to respond to those requested revisions.

7. Accordingly, the U.S. Trustee objects to entry of the proposed Order [ECF 67-1] without implementation of the U.S. Trustee’s requested revisions.

## **III. Reservation of Rights**

8. The U.S. Trustee reserves his right to supplement and/or amend this Limited Objection and to raise additional or further objections to the Application, at or prior to the hearing on the Application, or any other relevant hearing.

#### **IV. Prayer**

WHEREFORE, the U.S. Trustee prays that the Court: (a) sustain this Limited Objection; (b) continue the U.S. Trustee's objection deadline to the Application to a date acceptable to the U.S. Trustee so as to allow the U.S. Trustee to adequately respond to Debtor's response to the comments and requested revisions; and (c) grant such other and further relief as the Court deems just and equitable.

Dated: January 26, 2024

Respectfully submitted,

KEVIN M. EPSTEIN  
UNITED STATES TRUSTEE  
Region 7  
Southern and Western Districts of Texas

By: /s/ Jana Smith Whitworth  
Jana Smith Whitworth  
Trial Attorney  
SBOT No. 00797435/Fed ID 20656  
515 Rusk Avenue, Suite 3516  
Houston, TX 77002  
Telephone: (713) 718-4650  
Facsimile: (713) 718-4670  
Email: [Jana.Whitworth@usdoj.gov](mailto:Jana.Whitworth@usdoj.gov)

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served by electronic means on all PACER participants, as listed below, on January 26, 2024.

By: /s/ Jana Smith Whitworth  
Jana Smith Whitworth

Label Matrix for local noticing  
0541-4  
Case 23-34815  
Southern District of Texas  
Houston  
Fri Jan 26 17:36:41 CST 2024

City of Houston  
Linebarger Goggan Blair & Sampson LLP  
c/o Tara L. Grundemeier  
PO Box 3064  
Houston, TX 77253-3064

Houston Community College System  
Linebarger Goggan Blair & Sampson LLP  
c/o Tara L. Grundemeier  
PO Box 3064  
Houston, TX 77253-3064

4  
United States Bankruptcy Court  
PO Box 61010  
Houston, TX 77208-1010

Ali Choudhry  
1001 West Loop South 700  
Houston, TX 77027-9084

CNA Insurance Co  
PO Box 74007619  
Chicago, IL 60674-7619

City of Houston  
PO Box 1560  
Houston, TX 77251-1560

Datawatch Systems  
4520 East West Highway 200  
Bethesda, MD 20814-3382

Firetron  
PO Box 1604  
Stafford, TX 77497-1604

HNB Construction, LLC  
521 Woodhaven  
Ingleside, TX 78362-4678

2425 WL, LLC  
2425 West Loop South 11th floor  
Houston, TX 77027-4304

Galleria 2425 Owner, LLC  
1001 West Loop South 700  
Houston, TX 77027-9084

Houston ISD  
Linebarger Goggan Blair & Sampson LLP  
c/o Tara L. Grundemeier  
PO Box 3064  
Houston, TX 77253-3064

2425 WL, LLC  
13498 Pond Springs Rd.  
Austin, TX 78729-4422

Ash Automated Control Systems, LLC  
PO Box 1113  
Fulshear, TX 77441-2013

Caz Creek Lending  
118 Vintage Park Blvd No. W  
Houston, TX 77070-4095

City of Houston  
c/o Tara L. Grundemeier  
Linebarger Goggan Blair & Sampson LLP  
PO Box 3064  
Houston, TX 77253-3064

Environmental Coalition Inc  
PO Box 1568  
Stafford, TX 77497-1568

First Insurance Funding  
450 Skokie Blvd  
Northbrook, IL 60062-7917

Harris County Tax Assessor  
PO Box 4622  
Houston, TX 77210-4622

CC2 TX, LLC  
c/o Howard Marc Spector  
Spector & Cox, PLLC  
12770 Coit Road Suite 850  
Dallas, TX 75251-1364

(p)HARRIS COUNTY ATTORNEY'S OFFICE  
P O BOX 2928  
HOUSTON TX 77252-2928

National Bank of Kuwait, S.A.K.P., New York

ADT  
PO Box 382109  
Pittsburgh, PA 15251-8109

CFI Mechanical, Inc  
6109 Brittmoore Rd  
Houston, TX 77041-5610

Cirro Electric  
PO Box 60004  
Dallas, TX 75266

Comcast  
PO Box 60533  
City of Industry, CA 91716-0533

Ferguson Facilities Supplies  
PO Box 200184  
San Antonio, TX 78220-0184

Gulfstream Legal Group  
1300 Texas St  
Houston, TX 77002-3509

Houston Community College System  
c/o Tara L. Grundemeier  
Linebarger Goggan Blair & Sampson LLP  
PO Box 3064  
Houston, TX 77253-3064

Houston ISD c/o Tara L. Grundemeier Linebarger Goggan Blair & Sampson LLP PO Box 3064 Houston, TX 77253-3064	Kings 111 Emergency Communications 751 Canyon Drive, Suite 100 Coppell, TX 75019-3857	Lexitas PO Box Box 734298 Dept 2012 Dallas, TX 75373-4298
Logix Fiber Networks PO Box 734120 Dallas, TX 75373-4120	MacGeorge Law Firm 2921 E 17th St Bldg D Suite 6 Austin, TX 78702-1572	Mueller Water Treatment 1500 Sherwood Forest Dr. Houston, TX 77043-3899
National Bank of Kuwait 299 Park Ave. 17th Floor New York, NY 10171-0023	Nationwide Security 2425 W Loop S 300 Houston, TX 77027-4205	Nichamoff Law Firm 2444 Times Blvd 270 Houston, TX 77005-3253
TKE 3100 Interstate North Cir SE 500 Atlanta, GA 30339-2296	U.S. Trustee's Office 515 Rusk, Suite 3516 Houston, Texas 77002-2604	US Trustee Office of the US Trustee 515 Rusk Ave Ste 3516 Houston, TX 77002-2604
Waste Management PO Box 660345 Dallas, TX 75266-0345	Zindler Cleaning Service Co 2450 Fondren 113 Houston, TX 77063-2314	James Q. Pope The Pope Law Firm 6161 Savoy Drive Ste 1125 Houston, TX 77036-3343
Reese W Baker Baker & Associates 950 Echo Lane Suite 300 Houston, TX 77024-2824	Rodney Drinnon McCathern Houston 2000 W Loop S Ste. 1850 Houston, TX 77027-3744	

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Harris County, ATTN: Property Tax Division  
Harris County Attorney's Office  
P.O. Box 2928  
Houston, TX 77252-2928 United States

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)2425 West Loop, LLC

End of Label Matrix	
Mailable recipients	46
Bypassed recipients	1
Total	47